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            IN THE UNITED STATES DISTRICT COURT
           FOR THE NORTHERN DISTRICT OF ILLINOIS
 2
                      EASTERN DIVISION
 3
     OSBALDO J. NICOLAS,
 4
                   Plaintiff,
                                     No. 15 CV 0964
 5
              vs.
 6
     NATHAN BERRY; WILLIAM
     QUALLS; JUSTIN SNELL;
 7
     MATTHEW PURDOM; ROBERT
     HUGHES; JASON HART;
 8
     RICHARD HARRINGTON;
     KIMBERLY BUTLER; and
 9
    AIMEE LANG,
10
                   Defendants.
11
              The videoconference deposition of ROBERT
   HUGHES, taken pursuant to the Federal Rules of
12
13
    Civil Procedure, before Nicole M. Cheney, Certified
    Shorthand Reporter No. 084-004744, at 20 North
14
15
   Clark Street, Suite 1260, Chicago, Illinois, on
    Friday, August 4, 2017, commencing at 8:58 a.m.,
16
17
   pursuant to notice.
18
          APPEARANCES:
19
              LOEVY & LOEVY, by
              MS. JULIE GOODWIN
20
              (311 North Aberdeen Street, 3rd Floor
              Chicago, Illinois 60607
21
               312.243.5900
               julie@loevy.com)
22
                 appeared on behalf of the plaintiff;
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ROBERT HUGHES, 08/04/2017

Page 38 Okay. And you don't recall one way or 1 O. the other then whether Mr. Nicolas is proficient in 2. 3 the English language, correct? No, I do not know that. 4 Α. Aside from any statements that may 5 0. 6 be written on this form, you don't independently 7 recall anything that he said during the hearing, 8 correct? 9 That is correct. Α. 10 You don't recall if he handed you any Ο. 11 notes during the hearing? 12 Α. Nope, I do not recall. 13 And you don't recall if he asked for 0. time to interview any witnesses, correct? 14 15 Nope, I do not recall. Α. Okay. You likewise do not recall who 16 Ο. 17 Edgar Diaz is, correct? An inmate at Menard. 18 Α. No, I do not know -- do you know what his nickname is. I might know him by his nickname. 19 20 That's fair, but I don't know his Q. 21 nickname. I don't. 22 Okay. No, off the top of my head, I do Α. 23 not know who he is. 24 Q. Okay. And then is it fair to say you